

THE UNITED STATES DISTRICT COURT  
FOR THE  
MIDDLE DISTRICT OF ALABAMA

RECEIVED

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Anthony Richards, Sr.,  
Plaintiff(s),

v.

Dave Sutton, Sheriff, et. al  
Capt. Richard B. Moss, Administrator,  
Dallas Gibson, Corrections Officer  
Defendants,

2007 MAR 26 A 10:54

DEBRA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

CIVIL ACTION NO. 1:07-cv-261-WKW  
Supply by Clerk

BRIEF IN SUPPORT

Come now the Plaintiff Anthony Richards, Sr., make this brief in support of his allegation, that the liability of each defendant Dave Sutton, Sheriff, Capt. Richard B. Moss Administrator, Dallas Gibson, Correction Officer, under the ~~circumstances~~ circumstances, in his own individual action is liable for the plaintiff injury, which has accrued on the date of 3-9-07.

Constitutional Rights fits in the harm that has come to the defendant physically injury, the defendant moves for "substance due process" pursuant to the due process clause of the Fourteenth Amendment, because the Fourth Amendment provides an explicit textual source of federal constitutional protection against such physically harm, that has been caused or happen to an inmate while incarceration under government authority.

The Plaintiff that the court refer, that these's defendant are not entitled to absolute immunity from liability for damage, where the Plaintiff ~~safely~~ is or was under the care of three, official (3) Dallas Gibson, Correction officer, driver of the work truck and boss ~~of~~ over Plaintiff work sight (2) Capt. Richard B. Moss head official over Dallas Gibson driver of work truck and (1) Dave Sutton Sheriff, number one head over both, ~~the~~ Capt. Richard B. Moss, Dallas Gibson, and over Plaintiff.

Done this 21 day of MARCH 2007

Respectfully Submitted

Anthony Richards, Sr.  
Defendant

The Plaintiff request that this court <sup>appointment of</sup> ~~not~~ an attorney to represent him in the proceeding of this cause,